CORRES. CONTROL OUTGOING LTR. NO DOE ORDER # 4700.1 03-RF-00292 ITR ENC DIETER, T. FERRERA, D.W. FERRL M.S. LINDSAY, D. LYLE, J. MARTINEZ, L. A. PARKER, A POWERS, K SHELTON, D.C. SPEARS, M.S.

TRICE, K.D. TUOR, N. R.

AGUILAR, P.

BUTLER, J. L.

CERCLA AR (T130G) FRANCIS, M. FREIBOTH, C.

ALBIN, C. BEAN, C.

GIBBS, F. GUTHRIE, V.

KNAPP, S.

MARTIN, D. MYERS, K.

NESTA, S.

NORTH, K OLIVER, R.

OMAN, K.

PLAPPERT, R.

PRIMROSE, A.

ROSENMAN, A SNYDER, D.P. THOMPSON, J.

VANDERPOEL M.

WIEMELT, K WILLIAMS, L.

HUMISTON, T.

MARSCHALL, J.R.

COMPANY

February 17, 2003

03-RF-00292

Steve Tower D&D Program Lead DOE, RFFO

> ROCKY FLATS CLEANUP AGREEMENT (RFCA) STANDARD OPERATING PROTOCOL (RSOP) FOR FACILITY DISPOSITION - NOTIFICATION LETTER FOR BUILDING 441- FEG-008-03

> The Facility Disposition RSOP requires that DOE notify the Lead Regulatory Agency (LRA) prior to implementing work activities pursuant to this document. The "Type 2 Reconnaissance Level Characterization Report (RLCR), Building 441, Revision 0, January, 23, 2003" was submitted to CDPHE on February 4, 2003 (Correspondence Number 03-DOE-00114). Concerns were raised with this version of the RLCR utilizing the consultative process. These concerns were addressed in the revised document "Type 2, Reconnaissance Level Characterization Report (RLCR) and Pre-demolition Survey Report, Revision 1, February 11, 2003", which combined the RLCR and the PDSR into one report. Concurrence with the typing of this facility, as well as approval of the PDSR, with requirements, was received from CDPHE on February 13, 2003.

Attachment 1 provides a description of the facility. The Project Specific AR Index File is contained in Attachment 2. Deviations from the RSOP, including requirements from CDPHE, are addressed in Attachment 3. Attachment 4 consists of a contact record, dated 2/12/2003, which identifies the tasks to be performed under the ER RSOP. Attachment 5 outlines the demolition schedule, and Attachment 6 provides a building schematic.

The purpose of this Notification is to invoke this RSOP for demolition of the facility, based on the facility meeting the free-release criteria. The LRA will have 14 days to review this notification letter and provide

If you have any questions or require additional information, please contact Steve Nesta x6386.

Frank E. Gibbs CORRES.CONTROL ADMIN RECRD/T130G Deputy Project Manager TRAFFIC Remediation, Industrial D&D, and Site Services **PATS/130** CLASSIFICATION: Attachments: UCNI As Stated UNCLASSIFIED CONFIDENTIAL SECRET SVK:pvt **AUTHORIZED CLASSIFIER** SIGNATURE: Orig. and 1 cc - Steve Tower

CC: IN REPLY TO RFP CC NO .: Richard DeSalvo ACTION ITEM STATUS PARTIAL/OPEN

CLOSED

LTR APPROVALS: ORIG. & TYPIST INITIALS:

SVK:pvt



ADMIN RECORD

RF-46469(Rev.9/94)

Date

Kaiser-Hill Company, L L C

Pocky Flats Environmental Technology Site, 10808 Hwy. 93 Unit B, Golden, CO 80403-8200 ◆ 303-966-7000-

IA-A-001285

ATTACHMENT 1 FACILITY DESCRIPTION

Building 441 is a 17,800-sq. ft. single story concrete structure built in 1953. Building 441 was originally constructed as a laboratory to support the depleted uranium and beryllium operations, but was stripped out and converted to an administration building in 1966. An addition was added to the southern section of the structure. This addition was built in 1966 at the same time the building was converted to administrative use and never operated as a laboratory. The building currently measures approximately 200-ft long by 96-ft. wide by 15-ft. high and has a dock area in the southeast corner of the building. The building is currently configured with a hard walled office and cubical layout. Building 441 had sprayed on insulation applied to the northern exterior of the building in about 1978.





ATTACHMENT 6 BUILDING DRAWING

094000	B441 Slab Removal	7	0	E0AAM01	E0AAME1		:			ľ	! !		1
achthan			44.7		44,000				; ; ;		! ! ! . !	1	
002000	S441 Demolition (To Slab)	L	0	S4FEB03	EOAAM20	, ,	1	1 200	: : : : : :	1	1 1	l I	\Box
achica			1 (1 to 1)				1		1 1 1	ľ	i ;	! ! ! !	:
099000	B441 Asbestos Abatement - Phase II	9	0	13EEB03.	50FEB03		1		: ! ;		1 1	i I	
offsulnishnos	and the second s		3.74				!		;	ľ	1 1	1	!
41 - Produ	ction Support Offices						i			j			1
rea 3 Fac	noitiee Disposition					1	1		1 1 1		1 1	; ;	i
Activity Ol	реясцірноп	mg	сошь	hatz	finish	1	833	,	HAM	1	1		/W

KAISER.HILL

f to f feed?

RISS PROJECT Area 3 D&D (FY03)

B441 Demolition

EAGG - ASSI

Progress Bar
Progress Bar
Critical Activity

01FEB03 30SEP04 1 1FEB03 13:07 Start Date Finish Date Data Date Run Date

© Primavera Systems, Inc.

ATTACHMENT 5 SCHEDULE

Environmental Restoration Approach For Building Slab, Sewer and Process Waste Line Removal

Following is a generalized outline of the process used to remediate building slabs, associated process waste lines and sewer lines, and associated contaminated soils above action levels. Specific information for each project is developed in a project-specific Field Implementation Plan and may not exactly follow this sequence depending on the project site conditions.

- Project Handoff from D&D after building is removed
 - Slab exposed except for any contaminated or potentially contaminated sections of the slab that were covered/protected during building demolition
 - Sanitary sewers flushed, plugged at the surface and isolated outside the building footprint
 - Process waste lines plugged at the slab surface

Building Slab.

- Sawcut or otherwise isolate contaminated or potentially contaminated sections of the slab, process waste line and sewer line penetrations from potentially uncontaminated portions of the slab
- Remove the uncontaminated sections of the slab
 - > Perform radiological surveys and recycle or otherwise dispose of this material
- Remove contaminated and potentially contaminated sections of the slab
 - > Dispose as waste or perform radiological surveys/collect characterization data to recycle or otherwise dispose of this material
- Collect samples under slab as indicated in the sampling and analysis plan
 - > Collect additional biased samples where indicated
- Remediate contaminated soils above action levels

Sewer Lines

- Remove to 3 feet below the probable final grade
- Perform radiological surveys
 - > If clean, plug and GPS survey location
 - > If not clean, document and consult with lead Agency for disposition
 - ♦ Current guidance indicates removal required to 3 feet and 3 nCi/g

Process Waste Lines

- Expose line sections. If intact:
 - > Build glove bags around sections, tap and drain to remove free liquids then cut or break pipe and perform radiological surveys
 - > Foam or epoxy as required based on rad surveys
 - > If not intact, remove with soil
- Remove to 3 feet or as otherwise required
 - > Dispose as low level or low level mixed waste
- Collect samples as indicated in the sampling and analysis plan
 - > Collect additional biased samples where indicated
- Remediate contaminated soils above action levels
 - > This may require removal and disposal of additional pipeline
- Radiological survey remaining pipe, plug and GPS survey location
- Associated tanks are appropriately dispositioned based on tank-specific data

(4) Additionally, a decision needs to be made relative to how the western part of the slab needs to be handled. In addition, a plan for the removal of the UST's needs to be identified and discussed.

On February 12, 2003, at 0810, the State (Kruchek) was informed of the desire to remove the security screen covers on the exterior of the Building 441 windows to facilitate the taping of the windows in support of window removal. The State (Kruchek) concurred with this evolution with the stipulation that the removal could not impact the integrity of the facility structure from a containment perspective. If removal of the screens did create a situation where the interior of the building would be exposed to the elements, the opening must be secured.

On February 12, 2003, at 1330, during the joint DOE/State/KH Area 3 meeting, the following information was provided and discussed with the State (Kruchek):

- (1) Environmental Restoration (Primrose) presented their general strategy for their work associated with the slab removal, soil remediation, and tank removal.
- (2) A copy of the Building 441 demolition work control document and project health and safety plan was provided. Particular areas in the work document were discussed which answered previous questions that had been asked by the State (Kruchek).
 - (a) Page 17, 4.15 Exposure Monitoring/Medical Surveillance
 - (b) Page 23, 4.37 Radiological Controls identifies and discusses fixed radiological contamination
 - (c) Page 24, 4.41 Asbestos Controls identifies and discusses the residual mastic and floor tile that remains in the facility
 - (d) Page 30, JHA 3.8 Hazard and Controls for the radiological and asbestos contaminants, and floor drains.
 - (e) Appendix F 2 Prerequisites
 - (f) Appendix F 3. (a) Note related to floor drain plugs.

On February 12, 2003, at 1345, based on the information discussed associated with Building 441, the State (Kruchek) authorized the completion of asbestos abatement activities associated with Building 441 prior to final concurrence with the PDSR previously submitted.

Required Distribution:

P. Arnold, K-H R. Leitner, K-H C. Deck, K-H J. Mead, K-H R. DiSalvo, RFFO S. Nesta, K-H C. Gilbreath, K-H K. North, K-H W. Prymak, DOE S. Gunderson, CDPHE T. Rehder, USEPA T. Hopkins, K-H L. Kilpatrick, K-H D. Shelton, K-H J. Legare, RFFO C. Zahm, K-H

Additional Distribution:

C. J. Freiboth, K-H D. Kruchek, CDPHE S. Tower, DOE

Contact Record 02/12/03

(2) **Question**: Were there any beryllium swipes conducted in the overheads?

Response: A meeting was held with Duane Parsons, C. J. Freiboth, and the State (Kruchek) on February 10, 2003, at 1500 in T124A. Based on the information presented at this meeting, it was agreed that the overhead area of Building 441 is sufficiently characterized from a beryllium perspective.

(3) <u>Question</u>: Are there any potentials for the contamination in the slab (radiological) becoming airborne? Should the removal of the contaminated portion of the slab and the drains and piping be conducted while the structure is still in place?

Response: This question was addressed during a later contact.

(4) What are the concerns with leaving the asbestos residual on the slab?

Response: No concerns from an asbestos containing material perspective.

(5) What are the PDS requirements for leaving asbestos on the slab. See SOP – Facility Disposition requirements.

Response: This question was addressed during a later contact.

(6) What are the controls that will be in place during the demolition of the facility to specifically address the "what if" if one of the plugs that are in the floor drains comes loose or are damaged during the removal of the upper structure.

Response: This question was addressed during a later contact.

On February 10, 2003, at 0955, a meeting was held in T124A with the State (Kruchek), Tom Lindsey, James Hindman. During the meeting, it was determined that:

- (1) Before asbestos abatement can occur in Building 441, a resolution needs to be made regarding the numbers of beryllium samples taken in the overheads (resolved).
- (2) Before asbestos abatement can occur in Building 441, a resolution needs to be made regarding the residual asbestos that has been identified in two of the building locations. Specifically, in Room 126 (Orange Tile Chrysotile @ 10%) and Room 143 (Black Mastic Chrysotile @ 10%).
 - What are the plans for remediation or protection of the residual asbestos
- (3) Additional conversations related to addressing the entire process waste system in the building need to be resolved. What are the specific plans for handling the drains (both process and sanitary)

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time:

02/12/03 - 1345

Site Contact(s):

C. J. Freiboth (KH) – (CJF-062)

Phone:

(303) 966-2823

Regulatory Contact: David Kruchek, CDPHE

Phone:

(303) 692-3328

Agency:

CDPHE -

Purpose of Contact: State (CDPHE) concurrence on completing asbestos abatement activities in Building 441 prior to State concurrence with the Pre-Demolition Survey (PDS) / Reconnaissance Level Characterization (RLC) Report

Meeting Attendance

C. J. Freiboth, KH PM

Davis Kruchek, CDPHE

Discussion

On February 4, 2003, at 0855, a telephone conversation was held with the State (Kruchek) related to protecting the two portions of the Building 441 slab that have identified fixed radiological contamination. The cover needs to be protective enough to prevent gauging of the area during facility demolition and secured in a manner to prevent removal during waste loadout activities.

On February 10, 2003, at 0640, a telephone conversation was held with the State (Kruchek) related to the Pre-Demolition Survey Report (PDSR). The State (Kruchek) had some specific questions related to the PDSR, which are summarized as below:

(1) Request: Needs chemical data for all sample coring conducted in Building 441 specifically, Metals, VOC's, and SVOC's.

Response: The requested information was provided data to the State (Kruchek) on February 10, 2003, at 1500.

ATTACHMENT 4 TASKS TO BE PERFORMED UNDER ER RSOP

ATTACHMENT 3 DEVIATIONS FROM THE RSOP

Deviations from the RSOP involve the presence of remaining radiological and asbestos contamination in the facility. These are also the requirements addressed in the RLCR/PDSR approval letter from CDPHE, dated 2/13/2003.

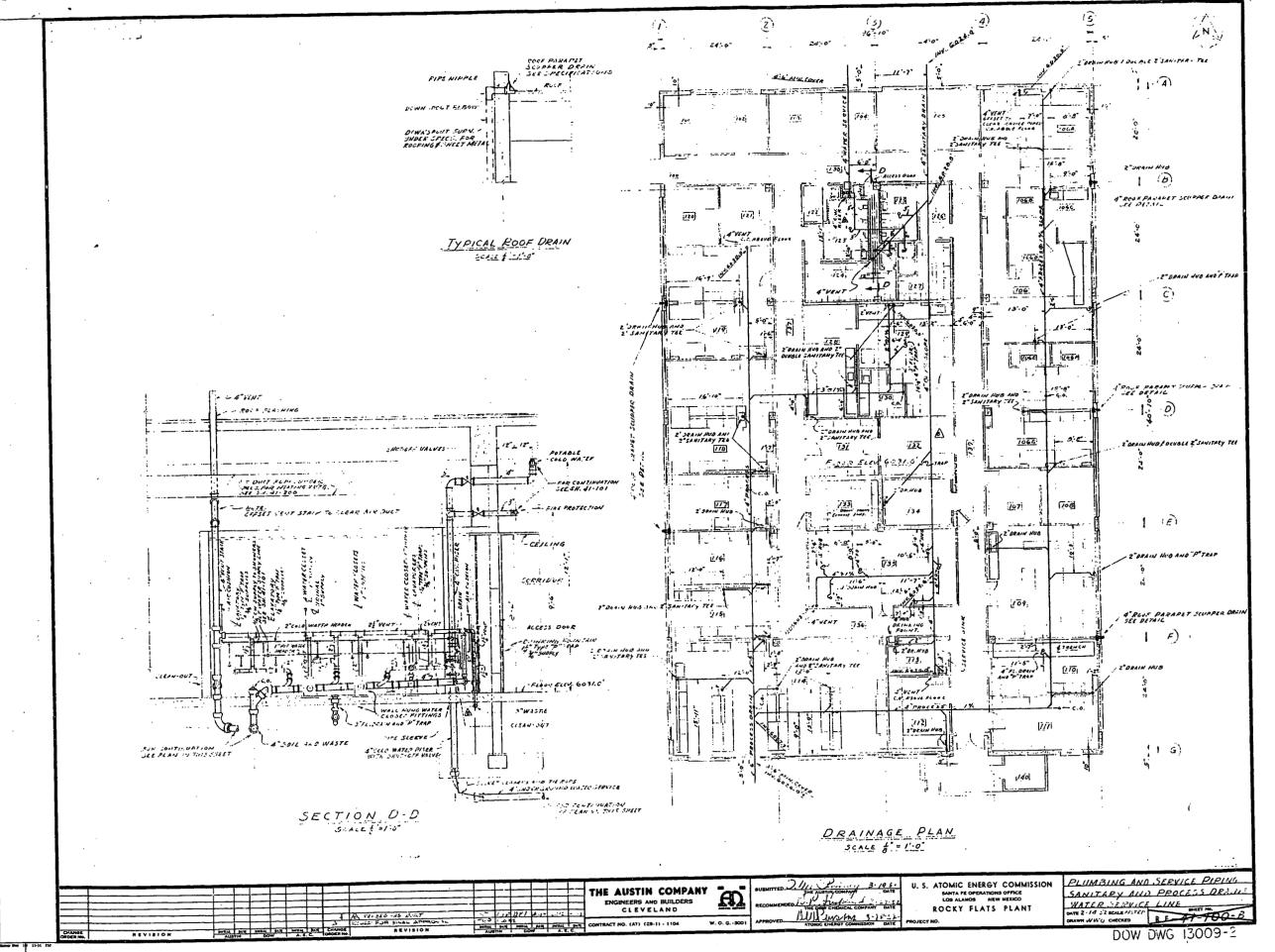
Radiological (uranium) contamination of the building foundation (slab) is present in two locations in the facility. These areas will be covered with stainless steel sheeting, and the sheeting will be secured to the floor. The sheeting will also be painted to enhance visibility. Upon completion of the demolition of the upper areas of the facility, these areas will be addressed. The concrete in the contaminated areas will not be free released to be recycled.

Non-friable mastic and floor tiles remain in two former bathroom areas in the facility. The areas of contamination will be painted to enhance visibility, The concrete associated with these areas will be segregated, and will not be recycled.

Floor drains in the facility have been grouted, and painted.

ATTACHMENT 2 PROJECT SPECIFIC AR FILE INDEX

- 1. Document No. IA-A-001023, 5/17/2002, Contact Record: Building 441 and 443 Scoping Meeting Minutes, which discusses the facility types of these buildings. Author: Freiboth, CJ. Recipient: Kruchek, David.
- 2. Document No. IA-A-001155, 9/25/2002, Contact Record: CDPHE concurrence on performing asbestos abatement in B441 to expose areas of potential concern in support of RLC activities. Author: Freiboth, CJ. Recipient: Kruchek, David.
- 3. Document No. IA-A-001238, 1/9/2003, Contact Record: Discusses CDPHE concurrence on performing B441 Be decontamination discovered during RLC/PDS activities. Freiboth, CJ. Recipient: Kruchek, David.
- 4. Document No. IA-A-001255, 1/14/2003, Correspondence No. 00023-RF-03. CDPHE approves the Draft Industrial Area Sampling and Analysis Plan (IASAP), FY 2003, Addendum No.IA-03 –01, IHSS groups 300-3, 300-4, 400-8, 700-4, 800-1, and 900-3, September 2002. Author: Gunderson, Steve. Recipient: DiSalvo, Richard.
- 5. Document No. IA-A-001272, 2/4/2003, Correspondence No. 03-DOE-00114; 00088-RF-03. Forwards the RLCR and PDSR for B441 for approval. This building has been characterized as a Type 2 facility. Author: DiSalvo, Richard. Recipient: Gunderson, Steve.
- 6. Document No. SW-A-004697, 12/13/2002, Correspondence No. 02-DOE-01598; 00867-RF-02. Forwards enclosed map depicting exterior building survey results and a matrix of exterior PDS results for approval.



12/12